

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

IN RE: JOHNSON & JOHNSON
TALCUM POWDER PRODUCTS
MARKETING, SALES PRACTICES,
AND PRODUCTS LIABILITY
LITIGATION

MDL No. 3:16-md-02738-MAS-RLS

This Document Relates To:

Bondurant v. Johnson & Johnson
No. 3:19-cv-14366-MAS-RLS

Gallardo v. Johnson & Johnson
No. 3:18-cv-10840-MAS-RLS

Judkins v. Johnson & Johnson
No. 3:19-cv-12430-MAS-RLS

Converse v. Johnson & Johnson
No. 3:18-cv-17586-MAS-RLS

Newsome v. Johnson & Johnson
No. 3:18-cv-17146-MAS-RLS

Rausa v. Johnson & Johnson
No. 3:20-cv-02947-MAS-RLS

NOTICE OF MOTION FOR SUMMARY JUDGMENT

PLEASE TAKE NOTICE that on a date to be determined by the Court, the undersigned counsel will bring Defendants Johnson & Johnson and LLT Management, LLC (“Defendants”)’s Motion for Summary Judgment before this

Court. Defendants will ask for entry of an order granting summary judgment in favor of Defendants and dismissing Plaintiffs' claims in their entirety, with prejudice.

PLEASE TAKE FURTHER NOTICE that in support of their motion, Defendants shall rely upon the Brief submitted herewith and the Declaration of Jessica Davidson, Esq., together with exhibits; and

PLEASE TAKE FURTHER NOTICE that a proposed Order is submitted herewith; and

PLEASE TAKE FURTHER NOTICE that oral argument is requested.

Dated: August 23, 2024

Respectfully submitted,

/s/ Susan M. Sharko

Susan M. Sharko

**FAEGRE DRINKER BIDDLE &
REATH LLP**

600 Campus Drive

Florham Park, NJ 07932

(973) 549-7350

susan.sharko@faegredrinker.com

Allison M. Brown

Jessica Davidson

**SKADDEN, ARPS, SLATE,
MEAGHER & FLOM LLP**

One Manhattan West

New York, New York 10001

(212)-735-3000

Allison.brown@skadden.com

Jessica.davidson@skadden.com

*Attorneys for Defendants Johnson &
Johnson and LLT Management, LLC*